

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:22-cv-203-JRG
	)	
MICRON TECHNOLOGY, INC.;	)	JURY TRIAL DEMANDED
MICRON SEMICONDUCTOR	)	
PRODUCTS, INC.; MICRON	)	
TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

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**DECLARATION OF YANAN ZHAO IN SUPPORT OF  
PLAINTIFF NETLIST, INC.'S REPLY IN SUPPORT OF ITS MOTION  
TO STRIKE DEFENDANTS' SEPTEMBER 14, 2023 SUPPLEMENTAL  
RESPONSE TO INTERROGATORY NO. 1 (DKT. 184)**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. ("Netlist") in the above-captioned action. I am a member in good standing of the State Bar of California and the State Bar of Texas and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.'s Reply in Support of its Motion to Strike Defendants' September 14, 2023 Supplemental Response to Interrogatory No. 1 (Dkt. 184). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 14** is a true and correct excerpted copy of the transcript of the deposition of Boe Holbrook, dated August 30, 2023.

3. Attached as **Exhibit 15** is a true and correct excerpted copy of the transcript of the deposition of Ralph Kim, dated September 27, 2023.

4. Attached as **Exhibit 16** is a true and correct excerpted copy of the transcript of the deposition of Dave Wilson, dated September 27, 2023.

5. Attached as **Exhibit 17** is a true and correct copy of a letter from Netlist Counsel to Micron Counsel dated June 2, 2023.

6. Attached as **Exhibit 18** is a true and correct copy of email correspondence between Counsel for Netlist, Micron, and third-party Renesas between June 19 and September 19, 2023.

7. Attached as **Exhibit 19** is a true and correct excerpted copy of the transcript of the claim construction hearing in this action, held on July 26, 2023.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 13, 2023, in Los Angeles, California.

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By */s/ Yanan Zhao*  
Yanan Zhao